



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #4
Demobe for Winter
Anglo Enterprises Company Site

Webster, MA
Latitude: 42.0586268 Longitude: -71.8791452

To: Polrep Distribution, USEPA-R1

From: Allen Jarrell, OSC

Date: 11/22/2016

Reporting Period: 10/31/2016 - 11/18/2016

1. Introduction

1.1 Background

Site Number:	01MR	Contract Number:	EP-S1-16-01
D.O. Number:		Action Memo Date:	7/6/2016
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/15/2016	Start Date:	8/15/2016
Demob Date:		Completion Date:	
CERCLIS ID:	MAD001125897	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

1.1.2 Site Description

In 1900, Intervale Mills in Webster was established at this Site. Anglo Fabrics Company (Anglo) purchased the facility around 1940. Anglo manufactured woollens in Webster and at its peak employed 500 people. In January 1998, Anglo filed for bankruptcy and closed in 1999. Mill Investment Associates, LLC purchased the Site when the tenants were; a body shop, an on-line store, an electrical distributor, a woodworking company, and a car storage facility. As the building deteriorated, many tenants moved out, and Mill Investment Associates, LLC filed for bankruptcy and entered court supervised receivership. In 2014, 35 Pearl St, LLC formed to redevelop the property and acquired it on August 28, 2014. It was during this redevelopment period that the mill building was nearly destroyed by a catastrophic fire on June 25, 2015.

On November 10, 2015, at the request of the Massachusetts Department of Environmental Protection (MassDEP), EPA On-Scene Coordinator (OSC) Allen Jarrell and a Region 1 Superfund Technical Assessment and Response Team (START) contractor mobilized to the Site to conduct a Preliminary Assessment (PA) and Site Reconnaissance (SR). They conducted a perimeter SR, performed air and radiation monitoring and photo-documented site conditions and found no elevated readings above background. There were large piles of debris, miscellaneous debris that was strewn about the Site, and twisted steel beams and columns that remained following the fire. EPA and START documented these debris piles, fire damaged buildings, and transformers that had leaked oil.

On December 1, 2015, OSC Jarrell and three START contractors mobilized to the Site to conduct the Site Investigation (SI). They collected 38 samples from suspected ACM, and soil samples for polychlorinated biphenyls (six) and metals (nine). Following the sample collection, the samples were prepared and sent for analysis at the EPA New England Regional Laboratory.

1.1.2.1 Location

The former mill complex is located at 35 Pearl Street in Webster, MA and identified at the Webster Assessor's Office on Map 15, Block A, Parcel 1-0. The Site covers approximately nine acres and is bordered by the French River, and commercial and residential properties to the south, east and north, and by wooded areas, and railroad tracks to the west. It is situated in a mixed residential/commercial/industrial area. The general public is in proximity to this area with several residential rental properties, including a large apartment complex with basketball courts and a toddler playground area, situated directly across the street. Census 2010 data indicated 3,379 people live within a ½ mile of the Site.

1.1.2.2 Description of Threat

Immediately after the fire, the MassDEP Central Region Office (CERO) was made aware that ACM was found on exterior and interior surfaces throughout the buildings. The property owner had hired a Division of Local Services (DLS)-licensed asbestos contractor and a DLS-licensed asbestos inspector to begin asbestos removal prior to the fire. On June 30, 2015, the MassDEP CERO asbestos inspector and the DLS-licensed asbestos contractor both walked and surveyed the fire-damaged Site and collected 15 asbestos samples. The analytical results indicated 12

samples containing either chrysotile (up to 70%) or amosite (up to 55%) asbestos.

Remaining portions of the Site buildings are primarily steel beams and columns with a concrete block water treatment building located on the southern end of the Site adjacent to the French River. Two boilers are located on the southern portion of the property. The property owner initiated cleanup after the fire and there are several large piles of fire debris and steel that were being segregated for scrap/recycling. The property owner was not following appropriate asbestos cleanup practices and thus, MassDEP directed the property owner to halt the cleanup.

Subsequent to the fire, MassDEP was in close contact with the property owner attempting to expedite the immediate cleanup and decontamination of the asbestos-contaminated fire/demolition debris at the Site. The property owner did retain an asbestos consultant who worked with MassDEP to develop a Non-Traditional Asbestos Abatement Work Plan. After several drafts, MassDEP indicated that it could approve the plan and permit application when formally submitted. MassDEP was then informed by the property owner's environmental attorney that these documents would not be filed until a contractor had been retained to do the work. In subsequent phone conversations and again in a meeting held on September 25, 2015 at the MassDEP CERO, the attorney informed MassDEP that after receiving and reviewing the bids, his client did not have the money to conduct the necessary cleanup of the asbestos containing and asbestos contaminated fire/demolition debris.

Based on information in EPA's EJSCREEN environmental justice screening tool, 0 out of 12 Environmental Justice Indexes for the area within a one mile radius of the Site exceed the 80th percentile on a national basis, despite a preponderance of low-income rental properties.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The primary contaminant of concern is friable asbestos. Asbestos is a hazardous substance as defined by Section 101(14) of CERCLA, 42 U.S.C. §9601(14). Friable ACM in the areas that were compromised by the June 25, 2015 fire are now exposed to the elements presenting a release or threat of release of a hazardous substance that may pose an imminent and substantial endangerment to public health and the environment. Airborne friable asbestos is a health threat to anyone walking on, traveling by or living near the Site.

The November/December 2015 EPA PA/SI confirmed that widespread friable and non-friable ACM was found throughout the property, and that if not removed, represents a significant health hazard to workers, the general public and the environment. Of the 38 ACM samples taken, 14 were found to have at least trace amounts of asbestos. The PCBs were not detected. Regarding the metals samples, the samples containing chips of paint had elevated lead levels. The asbestos table below also includes data from the MassDEP/DLS samples taken on June 30, 2015.

Asbestos Type Found	EPA Results % (14 of 38 samples had ACM)	MassDEP/DLS Results % (12 of 15 samples had ACM)
Actinolite	1	
Amosite	Up to 5	Up to 55
Chrysotile	Up to 35	Up to 70

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On July 18, 2016, an Action Memorandum authorizing the Removal Action was signed by the Office Director of the Office of Site Remediation and Restoration after consultation with Office of Land & Emergency Management in EPA Headquarters.

2.1.2 Response Actions to Date

From October 29 through November 18, 2016, EPA, ERRS, and START continued removal action activities at the site.

October 31, 2016 through November 4, 2016

Conducted the following activities:

- Continued segregating and stockpiling scrap metal collected from areas on Site.
- Continued consolidation, staging, and tarping of the ACM pile.
- Demolished the wastewater treatment plant (WWTP) building using a hoe ram excavator attachment.
- Began demolition of additional concrete walls on the eastern side of the footprint with the hoe ram.
- Loaded two 60-cubic yard containers with scrap metal for transport to the metal recycling facility.
- ERRS HazCat chemist evaluated five drums for disposal characteristics.

November 7, 2016 through November 11, 2016

Conducted the following activities:

- Continued segregating and stockpiling scrap metal collected from areas on Site.
- Continued consolidation and completed tarping of the ACM pile for the Winter.
- Demolished and graded the loading dock ramp on the north-central side of the foundation footprint.
- Continued demolition of other concrete foundation areas around the footprint.
- Loaded one 60-cubic yard containers with scrap metal for transport to the metal recycling facility.

Conducted the following activities:

- Decontaminated and demobilized equipment and supplies for the Winter.
- Demobilized all personnel from the site for the Winter.
- Office trailer, Conex box, and trash receptacle are secured and remain on Site.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Recycled steel		1082 ton		60 loads	

2.2 Planning Section

2.2.1 Anticipated Activities

Upon restart in the Spring of 2017, conduct perimeter air particulate monitoring and continue dust control and suppression.

Conduct the removal and disposal of asbestos and ACM debris. The process shall also include provisions for on site decontamination of scrap metal, and segregation of asbestos-free debris. Asbestos material and asbestos-contaminated waste will be documented, and shipped off-site for disposal at EPA approved facilities. All wastes will be staged in a secure area on-site while awaiting shipment to CERCLA compliant off-site disposal facilities.

Conduct multi-media sampling as needed to support site activities.

Conduct sampling of drums or other containers if found during debris excavation at the Site. If drums/containers are found to contain hazardous substances, they will be repackaged, categorized, staged, manifested, and shipped off-site for disposal at EPA-approved facilities. If they contain oil product they will be referred to the Massachusetts Department of Environmental Protection (MassDEP).

After the asbestos-containing debris is removed, conduct grading and backfilling activities, as needed, to secure the open excavated areas of the Site. A visual marker may also be installed to delineate contaminated soils (if any) which may remain at depth or which cannot otherwise be excavated (Completion of this task may be contingent upon approval of the MassDEP and the City of Webster to allow EPA to use the clean concrete, or other backfill being provided by the City or another stakeholder of the project).

Referring the Site to MassDEP for any long-term remedial measures (including institutional controls and long-term operation and maintenance) that may be required to address remaining Site risks.

Depending on anticipated storage duration prior to shipment for ultimate disposal, the OSC will determine whether waste will be staged on-Site or shipped to a properly permitted temporary storage facility. Waste staging options will be evaluated based on cost.

Where practicable, final disposal of waste from the Site will utilize an alternative technology to landfilling. The specific treatment and disposal technology will depend on factors such as the quantity and hazardous characteristics, as well as the availability of alternate technologies.

2.2.1.1 Planned Response Activities

Conducted the following activities:

- Continue segregating and stockpiling scrap metal collected from the Site.
- Continue loading trailers/containers with scrap metal and transporting the containers to a metal recycling facility.
- Continue segregating and stockpiling the Asbestos and ACM construction and fire debris.

2.2.1.2 Next Steps

See above.

2.2.2 Issues

There are no additional issues.

2.3 Logistics Section

None

2.4 Finance Section

2.4.1 Narrative

An action memorandum authorizing a removal action ceiling of \$2,000,000, including contingency, was authorized on July 19, 2016. The budget estimate is set to: \$1.4 million for ERRS, \$400,000 for START, and \$200,000 in contingency. Funds of \$1,173,881.21 have been put on the ERRS Task Order to-date. ERRS and START costs are as of 11/18/2016.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,400,000.00	\$275,404.68	\$1,124,595.32	80.33%
TAT/START	\$400,000.00	\$120,007.00	\$279,993.00	70.00%
Contingency	\$200,000.00	\$0.00	\$200,000.00	100.00%
Intramural Costs				
USEPA - Direct	\$100,000.00	\$25,000.00	\$75,000.00	75.00%
Total Site Costs				
	\$2,100,000.00	\$420,411.68	\$1,679,588.32	79.98%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

None, the OSC is serving as Safety Officer.

2.5.2 Liaison Officer

None, the OSC is serving as liaison officer on-site and coordinating with the regional PIO/CIC office.

2.5.3 Information Officer

None, the OSC is serving as information officer on-site and coordinating with the regional PIO/CIC office. The regional PIO/CIC office has created Fact sheets for the Site and coordinated a community meeting that was held on August 31, 2016. In addition, a community relations plan will have to be created.

3. Participating Entities

3.1 Unified Command

This Site isn't being run as a formal unified command.

3.2 Cooperating Agencies

The OSC is coordinating with the town of Webster and the MassDEP, Central Regional office for the duration of this project.

4. Personnel On Site

EPA OSC - 1

EPA START - 1

EPA ERRS - 5

5. Definition of Terms

None

6. Additional sources of information

6.1 Internet location of additional information/report

None

6.2 Reporting Schedule

To be decided.

7. Situational Reference Materials

No information available at this time.